

REMARKS/ARGUMENTS

In the Office Action mailed February 21, 2006, claims 1-3, 5, 7-23, 25, 26, and 28-38 are pending and stand rejected. Applicants have thoroughly reviewed the outstanding Office Action including the Examiner's remarks and the references cited therein. The following remarks are believed to be fully responsive to the Office Action.

Applicants thank the Examiner for the time spent conducting a personal interview with Applicants' representative, Annette Kwok, on April 26, 2005.

Claims 1, 7-16, 21, and 28-37 are amended. No new matter has been added. Thus, claims 1-3, 5, 7-23, 25, 26, and 28-38 are pending in the application and are believed to be patentable over the cited references. Reconsideration and withdrawal of the outstanding rejections are respectfully requested in view of the following remarks.

Claims 1, 16, and 21 are amended to clarify the invention. Supports for these claims can be found in the specification, at least, in paragraphs 19, 21, and 22 and FIGS. 1-6.

Claims 7-15 and 28-37 are amended to have proper antecedence basis.

CLAIM REJECTIONS – 35 U.S.C. §103

Claims 1, 2, 7, 8, 16, 17, 19-22, 28, and 37

The Examiner rejected claims 1, 2, 7, 8, 16, 17, 19-22, 28, and 37 under 35 U.S.C. §103(a) as being unpatentable over Gumbel (U.S. 6,393,379) (hereinafter referred to as "Gumbel"). Applicants respectfully traverse this rejection.

In light of the following remarks, Applicants respectfully submit that these claims are allowable. Without conceding the propriety of the rejections, claims 1, 16, and 21 have been

amended. Support for these amendments are to be found, at least, in paragraphs 19, 21, and 22 of the specification and FIGS. 1-6.

The Examiner bears the initial burden of factually supporting any prima facie conclusion of obviousness. *MPEP* §2142. To establish a prima facie case of obviousness, three criteria must be met. First, there must be some suggestion or motivation, to modify the references or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art must teach all the claim limitations. *MPEP* §2142. Applicants note that the reference does not teach all the claim limitations to support an obviousness rejection.

Gumbel discloses a controller area network diagnosis instrument for diagnosis and evaluation of electronic components on a vehicle control system. The controlled area network diagnostic instrument includes a computer processor with a graphics display. The processor has a cable to plug into the diagnostic connector engaged to a common data bus of the vehicle. The processor is programmed to graphically show a mock gauge cluster or vehicle instrument panel on the display in that has the same appearance as a real vehicle gauge cluster or vehicle instrument panel. (See Abstract).

The Examiner stated that, “[a] graphic display 121 of the computer processor 119 is connected to the data bus 18 by a connector 36 for providing of (sic) mock conventional gauges 124 *as of* real gauge 104.” (Emphasis added.) Applicants submit that the graphic display of the computer processor provides “mock” conventional gauges. However, these are graphical images of the analog gauges, but they are not real vehicle gauges.

In addition, the gauges cluster (display) 102 and the gauges 104 disclosed in Gumbel are existing part of the vehicle instrument panel inside a vehicle. (See Summary, col. 3, lines 35-60.) Furthermore, the Examiner also stated, “the vehicle instrument panel display 102 is

mounted on a mobile vehicle 101.” Therefore, these gauges are mounted on the vehicle panel display and are not additional gauges.

Furthermore, the display is part of the computer processor, which is connected to the data bus by a connector, and the data bus further connects to the gauges. Hence, in Gumbel’s system, the connector 36 is between the processor 119 and the real gauge 104. (See FIG. 2 of Gumbel).

It is respectfully submitted that Gumbel does not teach or suggest, *inter alia*, an automotive device for displaying vehicle parameters that are transmitted via a vehicle data bus having, at least, “one or more analog gauges, such that the gauges are additions to the existing gauges of a vehicle; a processor in circuit communication between the gauges and the connector,” as recited in independent claim 1. Furthermore, Gumbel does not teach or suggest, *inter alia*, a device for installing additional instrumentation in a vehicle having, at least, “one or more analog gauges, such that the gauges are additions to the existing gauges of the vehicle; means for placing a processing means in circuit communication between the gauges and the connection means,” as recited in independent claim 16. In addition, Gumbel does not teach or suggest, *inter alia*, a method for installing additional instrumentation in a vehicle having, at least, the step of providing an automotive device having “one or more analog gauges, such that the gauges are additions to the existing gauges of the vehicle; a processor in circuit communication between the gauges and the communications circuit,” as recited in independent claim 21.

Since each and every element, as set forth in the claims, is not found either expressly or inherently describe as required by the M.P.E.P, Gumbel cannot be said to anticipate the present invention, as recited in independent claims 1, 16, and 21. Hence, withdrawal of the rejection is respectfully requested.

Claims 2, 7, and 8 depend directly from independent claim 1; claims 17 and 19 depend directly from independent claim 16; and claims 22, 28, and 37 depend directly from independent claim 21; and claims 1, 16, and 21 are believed to be in condition for allowance. Therefore, these dependent claims are also believed to be in condition for allowance. Withdrawal of the rejection is respectfully requested.

Claims 3, 18, 23, and 38

The Examiner rejected claims 3, 18, 23 and 38 under 35 U.S.C. §103(a) as being unpatentable over Gumbel in view of Tomson (U.S. 6,871,121) (hereinafter referred to as “Tomson”). Applicants respectfully traverse this rejection.

In order for a §103 rejection to be proper, each element of the claim invention must be taught or suggested in the combination of the reference. For the reasons discussed above in connection with the §103(a) rejection of: claim 1 from which claim 3 depends directly; claim 16 from which claim 18 depends indirectly; and claim 21 from which claims 23 and 38 depend directly or indirectly, Gumbel is deficient in, at least, that it does not teach analog gauges in addition to the existing gauges of a vehicle and a processor in circuit communication between the gauges and the connector. Assuming, *arguendo*, that the combination of Gumbel and Tomson is proper, such a combination would not overcome Gumbel’s deficiency. For at least this reason, Applicants respectfully submit that claims 3, 18, 23, and 38 are patentable over the combination of Gumbel and Tomson and request that this §103 rejection be withdrawn.

Claims 5, 25, and 26

The Examiner rejected claims 5, 25 and 26 under 35 U.S.C. §103(a) as being unpatentable over Gumbel in view of Beckert *et al.* (U.S. 6,175,789) (hereinafter referred to as “Beckert”). Applicants respectfully traverse this rejection.

In order for a §103 rejection to be proper, each element of the claim invention must be taught or suggested in the combination of the reference. For the reasons discussed above in connection with the §103(a) rejection of: claim 1 from which claim 5 depends directly and claim 21 from which claims 25 and 26 depend directly or indirectly, Gumbel is deficient in, at least, that it does not teach analog gauges in addition to the existing gauges of a vehicle and a processor in circuit communication between the gauges and the connector. Assuming, *arguendo*, that the combination of Gumbel and Beckert is proper, such a combination would not overcome Gumbel’s deficiency. For at least this reason, Applicants respectfully submit that claims 5, 25, and 26 are patentable over the combination of Gumbel and Beckert and request that this §103 rejection be withdrawn.

Claim 9

The Examiner rejected claim 9 under 35 U.S.C. §103(a) as being unpatentable over Gumbel in view of Kubota *et al.* (U.S. 6,401,029) (hereinafter referred to “Kubota”). Applicants respectfully traverse this rejection.

In order for a §103 rejection to be proper, each element of the claim invention must be taught or suggested in the combination of the reference. For the reasons discussed above in connection with the §103(a) rejection of claim 1 from which claim 9 depends directly, Gumbel is deficient in, at least, that it does not teach analog gauges in addition to the existing gauges of a

vehicle and a processor in circuit communication between the gauges and the connector. Assuming, *arguendo*, that the combination of Gumbel and Kubota is proper, such a combination would not overcome Gumbel's deficiency. For at least this reason, Applicants respectfully submit that claim 9 is patentable over the combination of Gumbel and Kubota and request that this §103 rejection be withdrawn.

Claims 10, 11, 29, and 32

The Examiner rejected claims 10, 11, 29, and 32 under 35 U.S.C. §103(a) as being unpatentable over Gumbel in view of Hein *et al.* (U.S. 6,441,510) (hereinafter referred to as "Hein"). Applicants respectfully traverse this rejection.

In order for a §103 rejection to be proper, each element of the claim invention must be taught or suggested in the combination of the reference. For the reasons discussed above in connection with the §103(a) rejection of: claim 1 from which claims 10 and 11 depend directly and claim 21 from which claims 29 and 32 depend directly, Gumbel is deficient in, at least, that it does not teach analog gauges in addition to the existing gauges of a vehicle and a processor in circuit communication between the gauges and the connector. Assuming, *arguendo*, that the combination of Gumbel and Hein is proper, such a combination would not overcome Gumbel's deficiency. For at least this reason, Applicants respectfully submit that claims 10, 11, 29, and 32 are patentable over the combination of Gumbel and Hein and request that this §103 rejection be withdrawn.

Claims 12-15 and 33-36

The Examiner rejected claims 12-15 and 33-36 under 35 U.S.C. §103(a) as being unpatentable over Gumbel in view of Austin (U.S. 5,309,139) (hereinafter referred to as “Austin”). Applicants respectfully traverse this rejection.

In order for a §103 rejection to be proper, each element of the claim invention must be taught or suggested in the combination of the reference. For the reasons discussed above in connection with the §103(a) rejection of: claim 1 from which claims 12-15 depend directly and claim 21 from which claims 33-36 depend directly, Gumbel is deficient in, at least, that it does not teach analog gauges in addition to the existing gauges of a vehicle and a processor in circuit communication between the gauges and the connector. Assuming, *arguendo*, that the combination of Gumbel and Austin is proper, such a combination would not overcome Gumbel’s deficiency. For at least this reason, Applicants respectfully submit that claims 12-15 and 33-36 are patentable over the combination of Gumbel and Austin and request that this §103 rejection be withdrawn.

Claims 30 and 31

The Examiner rejected claims 30 and 31 under 35 U.S.C. §103(a) as being unpatentable over Gumbel in view of Hayashi *et al.* (U.S. 6,781,512) (hereinafter referred to as “Hayashi”). Applicants respectfully traverse this rejection.

In order for a §103 rejection to be proper, each element of the claim invention must be taught or suggested in the combination of the reference. For the reasons discussed above in connection with the §103(a) rejection of claim 21 from which claims 30 and 31 depend directly, Gumbel is deficient in, at least, that it does not teach analog gauges in addition to the existing

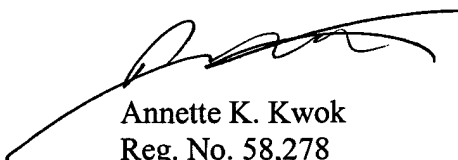
gauges of a vehicle and a processor in circuit communication between the gauges and the connector. Assuming, *arguendo*, that the combination of Gumbel and Hayashi is proper, such a combination would not overcome Gumbel's deficiency. For at least this reason, Applicants respectfully submit that claims 30 and 31 are patentable over the combination of Gumbel and Hayashi and request that this §103 rejection be withdrawn.

CONCLUSION

In view of the foregoing remarks, Applicants respectfully request that all the objections and rejections be withdrawn and that the application be allowed. If, for any reason, the Examiner disagrees, please call Applicants' undersigned representative at 202-861-1683 in an effort to resolve any matter still outstanding before issuing another action. Applicants' undersigned representative is confident that any issue which might remain can readily be worked out by telephone.

In the event this paper is not timely filed, Applicants petition for an appropriate extension of time. Please charge any fee deficiencies or credit any overpayments to Deposit Account No. 50-2036 with reference to our Docket No. 87355.9680.

Respectfully submitted,
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